

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

MICHAEL QUATTRUCCI,
Defendant.

Criminal Case No. 20-cr-00093-MSM-PAS

GOVERNMENT'S SENTENCING MEMORANDUM

The government recommends a sentence for Defendant Michael Quattrucci of one year of probation and a fine of \$ 9,500 to run concurrently on both counts.

There are several important facts that play a part in the government's recommendation. First, RI Beef & Veal had a history of violations of USDA food safety regulations before the events that gave rise to the instant indictment. There had been four Notices of Suspensions issued by USDA to the company since 2012. During that time Defendant was the president of the small family business.

Second, when the fourth Notice of Suspension was issued and the USDA inspector was withdrawn from the plant and further slaughter and meat processing operations forbidden Defendant deliberately disobeyed the suspension and continued operations in secret.

Third, as the company secretly continued in operation without the mandatory presence of a federal inspector Defendant's workers falsely marked the uninspected beef as having been USDA inspected. Defendant was in the small plant at the time this was going on. Clearly he was personally aware that his plant was operating without the

inspector and that the meat was being packed and falsely marked. A USDA supervisor arriving without warning caught the crime in progress. An employee told the USDA officer that the employee had been directed to pack the meat and apply the inspection marks.

Fourth, the following day another USDA officer arrived to find that even after the discovery of the illegal activity the day before plant operations had continued with meat cutting that was not permitted without the presence of the federal inspector.

So we have a pattern of non-compliance with food safety regulations leading into deliberate criminal activity on the part of Defendant. This pattern alone calls for a fine.

But there is a larger significance. The USDA inspection mark has universal trust and meaning with the American public and across the restaurant business. It is of utmost importance that there be no loss of confidence in the truth of that mark. Defendant's actions are felonies precisely because he compromised the guarantee of the USDA inspection mark. For that a no-nonsense fine must be imposed. Given the facts of this case a fine of \$ 9,500 is sufficient but not greater than necessary to address the familiar 3553 factors.

Respectfully submitted,

UNITED STATES OF AMERICA
By its Attorney,

ZACHARY A. CUNHA
United States Attorney



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